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Washington, DC 20036

September 3, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Ex Parte Notice

RE: Proceeding on reforming the Commission's universal service contribution methodology
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, NSD File No. L-00-72
CC Docket Nos. 99-200, 95-116, 98-170

Dear Ms. Dortch,

On Tuesday, September 3, 2002, John Rose and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and Margot S. Humphrey of Holland & Knight LLP representing the National Rural Telecom Association (NRTA) met with Paul Garnett, Eric Einhorn, Diane Law Hsu, Narda Jones, Jon Secrest and Vickie Byrd of the Wireline Competition Bureau. In that meeting we discussed the legal and operational issues surrounding various proposals for reforming the universal service contribution methodology. NRTA and OPASTCO stated that the proposal put forth by the Coalition for Sustainable Universal Service (CoSUS) does not comply with Section 254(d) of the Telecommunications Act of 1996 in that it practically exempts from making contributions the primary providers of interstate transmission service. We also noted that the joint proposal of SBC and BellSouth is very similar to the recommendations made by NRTA and OPASTCO in its comments in this proceeding.

In accordance with FCC rules, this letter is being filed electronically in the above-captioned dockets.

Sincerely,

Stuart Polikoff
Director of Government Relations
OPASTCO